

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Eugene Westmoreland,)
)
)
Plaintiff,) No.: 23-cv-1851
)
)
v.)
)
)
Cook County Sheriff Thomas Dart, et al.)
)
)
Defendants.)
)

**JOINT AGREED MOTION FOR
EXTENSION OF TIME FOR BRIEFING OF DISPOSITIVE MOTIONS**

NOW COME Plaintiff, Eugene Westmoreland, by and through his attorneys, Thomas Morrissey and Patrick Morrissey, and Defendants, COOK COUNTY SHERIFF THOMAS DART, and COOK COUNTY, a body politic and corporate, by and through their attorneys, Jason E. DeVore, Troy S. Radunsky, and Zachary G. Stillman, of DeVore Radunsky LLC, pursuant to Fed. R. Civ. P. 6(b), and for this Fourth Agreed Motion for Extension of Time for Briefing of Dispositive Motions, state as follows:

1. Counsels for all parties have been in communication regarding this Motion and are in agreement as to the requested extension.
2. This is the Fourth requested extension to the dispositive motion deadlines in this matter.
3. The Parties brought the Third Agreed Motion on December 23, 2024 (ECF No. 99), which was granted on December 27, 2024, at which time this Court ordered Dispositive Motions due by February 14, 2025; Responses due by March 26, 2025; and Replies due by April 21, 2025. (ECF No. 100.)
4. Both Plaintiff and Defendants remain in agreement they still need additional time to draft any dispositive motions. Briefing summary judgment prior to a decision on the

pending motion for class certification may present “a formula for one-way intervention.” *See Bennett v. Dart*, 953 F.3d 467, 469 (7th Cir. 2020).

5. Accordingly, the parties now request additional extensions to all deadlines, up to and including the following dates: Dispositive Motions due by May 2, 2025; Responses due by June 13, 2025; and Replies due by July 18, 2025.
6. Under Rule 6(b), this Court may, for good cause, extend the time “[w]hen an act may or must be done.” Fed. R. Civ. P. 6(b).
7. Not granting the requested extensions of time would prejudice the parties because the current deadlines will not allow sufficient time to properly prepare and submit their briefs.
8. The extension will grant the parties sufficient time to prepare their briefs, as well as allow the Court more time to potentially rule on the aforementioned pending Motions, the results of which could strongly impact both parties’ arguments at this dispositive stage.
9. Granting an extension of time will not prejudice any party and this motion is not brought for undue delay or any improper purpose.

WHEREFORE, the Parties respectfully request that this Honorable Court enter an order as

follows:

1. The Joint Agreed Motion for Extension of Time is granted;
2. Dispositive Motions are due by May 2, 2025; Responses are due by June 13, 2025; and Replies are due by July 18, 2025; and
3. Any other such relief as this court deems reasonable and just.

Respectfully Submitted,

/s/ Patrick Morrissey
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By: /s/ Zachary G. Stillman
Zachary G. Stillman, One of the
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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that the above **Joint Agreed Fourth Motion for Extension of Time** was filed on January 21, 2025, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/Zachary Stillman
Zachary Stillman